

CRIMINAL COMPLAINT  
(Electronically Submitted)

<b>United States District Court</b>	<b>DISTRICT of ARIZONA</b>
United States of America v. <b>Destiney Rae MONTOYA</b> DOB: 2000; United States <b>Keidy Yareli RIVERA-Villa</b> DOB: 2001; Mexico	DOCKET NO.  <b>SEALED</b>
	MAGISTRATE'S CASE NO. <b>23-00004MJ</b>

Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(i)

**COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:**  
From a date unknown to on or about May 18, 2022, in the District of Arizona, **Destiney Rae MONTOYA** and **Keidy Yareli RIVERA-Villa**, named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport certain illegal aliens, and did so for the purpose of private financial gain; in violation of **Title 8 United States Code Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(i)**.

**BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:**

Beginning in 2021, an HSI investigation identified **Destiney Rae MONTOYA** and **Keidy Yareli RIVERA-Villa** as conspiring together and with others to transport illegal aliens for profit; some of the relevant communications and events are set forth below.

**MONTOYA** and **RIVERA** have a conversation on Facebook messenger that takes place between April 8, 2021 and May 8, 2021. **RIVERA** contacts **MONTOYA** by saying, "HMU" (hit me up). **MONTOYA** responds, "it's to pick up chickens." Chickens or "pollos" are common slang terms referring to Undocumented Non-Citizens (UNCs). **RIVERA-Villa** says she has done it before and asks if they provide a car or if she has to use her own. **MONTOYA** says she has to use her own. **RIVERA-Villa** asks when they need it done and how much they pay. **MONTOYA** says it needs to be done that day or the next and they are paying \$4,500.

The next day **RIVERA** contacts **MONTOYA** and asks when she needs to leave. **MONTOYA** tells **RIVERA** to leave now and asks if she can fit five people now for \$5,500. **RIVERA** says she can do it and asks if she has to cross the border. **MONTOYA** tells her she doesn't have to cross the border but that she has to go through a small checkpoint on the way back. **MONTOYA** tells **RIVERA** she will have the people get out and walk around the checkpoint and pick them back up. **MONTOYA** tells her to send a picture of her car. **RIVERA** sends a picture of a maroon Cadillac with black stripes and provides her phone number, (602) XXX-1053. **RIVERA** admitted to transporting UNC's for **MONTOYA** on this occasion during her interview on May 18, 2022.

(cont'd on back)

**MATERIAL WITNESS(ES) IN RELATION TO THE CHARGE:**

<b>DETENTION REQUESTED</b> COMPLAINT REVIEWED by AUSA Micah Schmit  Date: 2023.01.24 10:34:16 -07'00' <i>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</i>	<b>SIGNATURE OF COMPLAINANT</b> DANIEL R KICKER <small>Digitally signed by DANIEL R KICKER Date: 2023.01.24 08:58:02 -07'00'</small>  <b>OFFICIAL TITLE &amp; NAME:</b> Homeland Security Investigations Special Agent Daniel Kicker
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Sworn to telephonically.

 SIGNATURE OF MAGISTRATE JUDGE <sup>1)</sup>	<b>DATE</b> January 24, 2023
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<sup>1)</sup> See Federal Rules of Criminal Procedure Rule 3 and 54

CC: AUSA, USM, PTS

(BASIS OF COMPLAINANT'S CHARGE *continued from previous page*)

Law enforcement interdicted several additional alien smuggling transportation events connected to **MONTOYA** and/or **RIVERA**, some of those incidents are set forth below:

On July 1, 2021, a driver was encountered by United States Border Patrol (USBP) at the USBP checkpoint in Three Points, AZ. The driver was transporting seven UNC's in a black Ford Expedition. The driver was interviewed and told USBP she was sent by a friend identified as "Kay" (**RIVERA**). Kay offered to pay her \$4,000 to pick up UNC's in Sells, AZ and take them to Tucson, AZ. The driver stated Kay was giving her instructions by text messages using phone number **(602) XXX-1053**. Subscriber information obtained for this number at this time confirm the phone belonged to **RIVERA**.

On August 7, 2021, a driver was arrested by USBP out of the Ajo Border Patrol Station for transporting six UNC's. The driver admitted to knowing the UNC's were illegally in the U.S. and said she was to be paid \$1,000 per UNC. The driver stated she was directed where to pick-up the UNC's and where to drop them off to walk around the USBP Checkpoint by **MONTOYA**. She was then directed where to pick them up again and directed on what route to take back to Phoenix, AZ. The driver said she was often paid by **MONTOYA** through Facebook Messenger (Facebook Pay) into her Chime account. HSI Agents uncovered a Facebook Messenger conversation between the driver and **MONTOYA** that takes place between April 11, 2021, and October 3, 2021. Many of the messages are human smuggling related and suggest that the driver attempted to drive UNC's for **MONTOYA** on at least two other occasions during September 2021.

In August 2021, HSI Agents began monitoring the Snapchat account of **destiney\_shawty**. The account is public, and anyone can "add" the account, and therefore be able to see what is being posted to it. The **destiney\_shawty** account often posted videos and pictures of herself. Agents compared these videos and pictures to the Arizona driver's license photographs of **MONTOYA** and determined that it was the same person. Agents observed posts attempting to recruit people to drive UNC's approximately two to three times per week.

On September 1, 2021, a driver was arrested by USBP in the Naco area for transporting four UNC's. The driver admitted she was to be paid \$700 per UNC. She said she was recruited by an individual on Snapchat using the username **destiney\_shawty** (**MONTOYA**). Conversations found on **MONTOYA**'s Snapchat discuss that driver's recruitment. The driver said **MONTOYA** put her in contact with other members of the human smuggling organization who directed her on where to pick up the UNC's and the route to take back to Phoenix, AZ. Information obtained from the driver's phone confirmed this.

HSI Agents began monitoring the Snapchat account **queenkeidy.com** on or about October 18, 2021. The account is public, and anyone can "add" the account, and therefore be able to see what is being posted to it. The **queenkeidy.com** account often posts videos and pictures of herself. Agents compared these videos and pictures to the Mexican passport and Mexican driver's license photographs of **RIVERA** and determined that it is the same person. From October 18, 2021 to October 31, 2021, HSI Agents observed seven posts asking for drivers. Many of the posts are photographs or videos of a large sum of money with a text caption overlaid on top of the picture. Examples of these text captions are:

queenkeidy.com - "Lmk need drivers 6.5k-20k in a day outta state n in state lmk lmk ASAP"  
 queenkeidy.com - "Lmk 3k-10k no check point"  
 queenkeidy.com - "Lmk lmk make what you get in a month of work in a day Everything is cash"

On May 18, 2022, HSI executed a Search Warrant on the residence of Destiney **MONTOYA** and Keidy **RIVERA**. Both **RIVERA** and **MONTOYA** spoke with HSI after waiving their *Miranda* Rights. Both admitted to Agents during interviews that they used social media platforms to recruit people to illegally transport UNC's and did so for the purpose of private financial gain.